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Stipulation for Order Continuing JSR Deadline - 1 Case No. 2:17-cv-00562-MJP The Honorable Marsha J. Pechman

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON; AMERICAN CIVIL LIBERTIES UNION OF MONTANA; and AMERICAN CIVIL LIBERTIES UNION OF NORTH DAKOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY and U.S. CUSTOMS AND BORDER PROTECTION,

Defendants.

Case No.: 2:17-cv-00562-MJP

STIPULATION FOR ORDER CONTINUING DEADLINE TO SUBMIT JOINT STATUS REPORT; ORDER THEREON

WHEREAS Defendants have produced non-exempt records responsive to Plaintiffs' request under the Freedom of Information Act ("FOIA") pursuant to the terms of the Court's Orders dated October 20, 2017 (ECF No. 36) and January 12, 2018 (ECF No. 40); and

WHEREAS the parties are required to submit a joint status report and proposed case schedule to the Court by January 31, 2018; and

WHEREAS the parties require additional time in which to meet and confer regarding Defendants' response to Plaintiffs' FOIA request and a proposed case schedule;

United States Department of Justice Civil Division, Federal Programs Branch 20 Massachusetts Ave. NW Washington D.C. 20001 (202) 514-3367

NOW THEREFORE, the parties, through their respective counsel, do hereby stipulate 1 and agree that that the Court may make and enter the following order: 2 The deadline for the parties' forthcoming joint status report and proposed case schedule, 3 currently due by January 31, 2018, is hereby continued for thirty days and shall be filed by 4 March 2, 2018. That filing should provide (without limitation): 5 1. The status of Defendants' response to Plaintiffs' FOIA request, and 6 2. A proposed briefing schedule for dispositive motions, if appropriate. 7 SO STIPULATED. 8 Respectfully submitted, Dated: January 29, 2018 9 10 United States Department of Justice Davis Wright Tremaine LLP 11 By /s/ Jason Lee By\_/s/ Eric M. Stahl, WSBA #27619 12 United States Department of Justice 1201 Third Avenue, Suite 2200 Civil Division, Federal Programs Branch 13 Seattle, WA 98101-3045 20 Massachusetts Avenue NW Telephone: (206) 757-8148 Washington, DC 20001 Fax: (206) 757-7148 14 Tel.: (202) 514-3367 Fax: (202) 616-8470 E-mail: ericstahl@dwt.com 15 Email: Jason.Lee3@usdoj.gov Emily Chiang, WSBA #50517 American Civil Liberties Union of 16 CHAD A. READLER Washington Foundation Acting Assistant Attorney General 17 901 Fourth Avenue, #630 Seattle, WA 98164 ANNETTE L. HAYES Email: echiang@aclu-wa.org 18 United States Attorney ELIZABETH J. SHAPIRO 19 Attorneys for Plaintiffs Deputy Director, Federal Programs Branch American Civil Liberties Union of 20 Washington, American Civil Liberties Attorneys for Defendants Union of Montana, and American Civil U.S. Department of Homeland Security and U.S. 21 Liberties Union of North Dakota Custom's and Border Protection 22 23 24 25 26 27 United States Department of Justice Stipulation for Order Continuing JSR Deadline - 2 Civil Division, Federal Programs Branch

20 Massachusetts Ave. NW Washington D.C. 20001

(202) 514-3367

Case No. 2:17-cv-00562-MJP

## **ORDER**

MARSHA J. PECHMAN

United States District Judge

1 2

IT IS SO ORDERED.

Stipulation for Order Continuing JSR Deadline - 3 Case No. 2:17-cv-00562-MJP

United States Department of Justice Civil Division, Federal Programs Branch 20 Massachusetts Ave. NW Washington D.C. 20001 (202) 514-3367

day of January 2018.

- 1	<u>CERTIFICATE OF SERVICE</u>
1	I hereby certify that on the 29th day of January, 2018, I electronically filed the
2	foregoing with the Clerk of Court by using the CM/ECF system. I certify that the following
3	
4	parties or their counsel of record are registered as ECF filers and that they will be served by the
5	CM/ECF system:
6	Emily Chiang ACLU OF WASHINGTON
7	901 Fifth Avenue, Suite 630 Seattle, WA 98164 Tel: (206) 624-2184 Email: echiang@aclu-wa.org  Eric M Stahl
8	
9	
10	DAVIS WRIGHT TREMAINE 1201 Third Avenue, Suite 2200
11	Seattle, WA 98101-3045
12	Tel: (206) 622-3150 Fax: (206) 628-7762 Email: ericstahl@dwt.com
13	Attorneys for Plaintiffs American Civil Liberties Union of Washington, American Civil
14	Liberties Union of Montana, and American Civil Liberties Union of North Dakota
15	/s/ Jason Lee
16	Jason Lee
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Stipulation for Order Continuing JSR Deadline - 4 Case No. 2:17-cv-00562-MJP

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